



Maryland Department of Planning

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April 25, 2008

Mr. Winslow "Jay" Parker
Town Manager
Town of Princess Anne
30489 Broad Street
Princess Anne, Maryland 21853

Dear Mr. Parker:

Thank you for the opportunity to comment on the draft Comprehensive Plan for the Town of Princess Anne. Princess Anne is a Town rich in historic resources, as well as sensitive environmental areas. Since the Town is projecting unprecedented growth for the 20-year horizon of the Plan, the Department feels that this plan update comes at a critical time in the Town's history from both a land use and adequate public facilities perspective. Good planning is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, community character, and economic development. This is especially relevant given the Town's inadequate supply of drinking water. It is apparent that the growth outlined in the draft document cannot be realized until the Town's water and sewer capacity issues have been appropriately addressed and resolved.

House Bill 1141 was adopted in the 2006 Session of the Maryland General Assembly. This bill requires the Town to include two new elements in its comprehensive plan: a Water Resources Element (WRE) and a Municipal Growth Element (MGE). The draft Plan acknowledges that the Town is currently working with Somerset County on a cooperative effort to draft the Town's WRE. The MDP commends the Town for approaching the development of this Plan element in a cooperative manner with the County. The draft document also makes reference to the fact that a MGE has been included in the Plan. It is the MDP's view that, although several of the items required for the MGE are included in the draft Plan, there are still several items that have not been adequately addressed, one of which is a development capacity analysis for the Town. As you know, per your request, the MDP is currently working with the Town on this analysis and will have some draft results to the Town in the near future. Once the analysis is done, the Town will have a better handle on the total amount of residential infill potential, which will in turn help to guide the Town's future growth plan. The Department recommends that the Town utilize the MDP's Models and Guidelines #25 and #26 on the MGE and WRE in order to see what information is necessary to be compliant with the requirements of HB1141. Please keep in mind that the deadline for adoption of the two elements is October 1, 2009, absent a request to the State for an extension.

Given the importance of maintaining the present unique character of Princess Anne, we have prepared a significant number of comments. Our comments are provided in the attachment to this letter. In addition, we forwarded a copy of the Plan to a number of State agencies for review including, the Departments of Transportation, Environment, Natural Resources, Business and Economic Development, Housing and Community Development, and Agriculture. Any plan review comments received to date from the various State agencies have been included as attachments for your consideration. Comments received after the date of this letter will be forwarded to you upon receipt.

The Department's comments reflect our thoughts on ways to strengthen the Plan as well as satisfy State requirements. We hope that consideration will be given to all of our comments as revisions to the draft Plan are made, and also to any future plans, ordinances, and policy documents that are developed. We understand the Plan will go to public hearing before the Planning Commission on May 6, 2008. It is our wish that you add our comments to the record of these hearings.

Please contact me at (410) 767-4500 or Tracey Gordy, Regional Planner for the Lower Eastern Shore, at (410) 713-3460.

Sincerely,



Stephanie Martins
Director, Land Use and Planning Analysis

Attachments

cc: Tracey Gordy
Chris Jukubiak

**Maryland Department of Planning
Review Comments
Draft Princess Anne Comprehensive Plan**

The Visions

Maryland's Planning Act of 1992 and subsequent legislation in 2000 requires that the eight Visions be included and implemented through the comprehensive plan. The Visions are first referenced on page 2 of the Plan, where it should be further clarified that the seven Visions were included in the 1992 Planning Act, which was amended in 2000 to add the eighth Vision. Also, the Plan could do a better job of connecting the Visions with the Plan's goals, policies, and actions in order to address the Visions in a more meaningful manner.

Population Projections

Population projections appear high for planning purposes. We also stress the importance of the Town participating in the U. S. Bureau of the Census' Annual Boundary and Annexation (BAS) survey.

We have completed our review of the population and housing unit characteristics presented in the Princess Anne Comprehensive Plan, with respect to Department of Planning data and information. For the most part these data are census related and comparable to data we maintain.

The Plan document uses a projected population of 7,280 inhabitants in 2030 as a basis for its objectives. This is an increase of 4,967 persons and is equivalent to the total projected population increase for Somerset County as a whole to 2030. Based on the historic and current population growth trends, we do not anticipate population growth for the town to increase quite that much, quite that fast.

Table 1: Princess Anne Population Trends: 2006 - 1970

2006 Census Estimate	2000 Census	1990 Census	1980 Census	1970 Census
2,845	2,313	1,666	1,499	975

Table 1 above displays historic and current U. S. Department of Commerce, Bureau of the Census population data for the Town of Princess Anne. The Town's population shows substantial growth during the 1970s and 1990s and current population estimates also show substantial population increases.

The Comprehensive Plan's population projection indicates the town's population will more than quadruple in size, growing at over six times the rate of the County's population

through the year 2030 (See Table 2). This growth is attributed to enrollment increases at the University of Maryland, planned residential development, and annexation.

During our review of the Plan, we prepared a series of reference projections for the town population using different techniques for evaluation purposes. These projections appear in Table 2, as well.

The first reference projection is based on a technique using historic population growth trends. This projection yields the highest population for Princess Anne by the year 2030. It assumes an average annual growth rate of about three times of that expected for Somerset County over the same period.

The second reference projection assumes that the ratio of Princess Anne's household population will remain in constant proportion to the Department of Planning's household population projection for Somerset County. It adds almost 1,000 persons to the town's population, for a 42-percent increase in total population.

The third reference projection presumes that the average annual growth rate for Princess Anne's household population is proportionate to the County's projected annual average growth rate. This projection increases the population of the town by over 200 inhabitants.

Table2: Summary of Princess Anne Reference Population Projections: 2000 - 2030

<u>Technique</u>	<u>2000</u>	<u>2030</u>	<u>Net</u>	<u>Percent</u>	<u>AAGR</u>
Reference 1	2,313	3,850	1,537	66.45	1.7129
Reference 2	2,313	3,273	960	41.50	1.1639
Reference 3	2,313	2,550	237	10.25	0.3257
Comprehensive Plan	2,313	7,280	4,967	214.74	3.8959
SOMERSET	24,747	29,700	4,953	20.01	0.6100

Prepared by the MD Department of Planning. Planning Services 2008.

We feel that the range provided by the Reference Projections (between 2,550 and 4,000 inhabitants), is an appropriate expectation of the population size of Princess Anne through 2030. In addition, since annexations are expected to play a more significant role in Princess Anne's residential development we should take the opportunity to stress the importance of the town participating in the Census Bureau's annual Boundary and Annexation Survey.

Water Resources Element and Municipal Growth Element

During the 2006 legislative session House Bill 1141 was passed requiring Counties and Municipalities to address several new elements within their Comprehensive Plans. Under the provisions of this law all new elements will need to be included into comprehensive plans by October 1, 2009. Guidance documents for the Municipal Growth Element and the Water Resources Element are available at the Maryland Department of Planning website (<http://www.mdp.state.md.us/>).

Water Resources Element (WRE)

The plan states on page 74 that "this plan does not include a water resources element." A WRE is required on or before October 1, 2009.

The February 2008 draft Town of Princess Anne Comprehensive Plan includes some of the preliminary information necessary to inform a WRE, such as: population projections through 2030; water/sewer demand (residential) by 2030; policies to reduce stormwater impacts (such as a no-net loss of forest policy, and reestablishment of stream buffers); policies to reduce water demand (such as water reuse); and identification of current development constraints (such as existing water demand exceeding current capacity).

To complete the WRE, the Town will need to:

- * Identify drinking water and other water resources that will be adequate for the needs of existing and future development proposed in the Land Use Element of the Plan, considering available data provided by the Maryland Department of the Environment (MDE); and

- * Identify suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs of existing and future development proposed in the Land Use Element of the Plan.

Completing the WRE will require close cooperation with Somerset County to identify methods to address infrastructure capacity constraints (since the County owns both the water and sewer systems serving the Town) and to forecast future pollution impacts due to the Town's land use, including point source (WWTP) and non-point source (septic tanks and stormwater runoff), to the Manokin River.

MDP recognizes that some analysis within the Plan may be incorporated within a WRE.

MDE is required to review the WRE to determine whether it is consistent with the programs and goals of the Department reflected in the general water resources program required under Section 5-203 of the Environment Article. Criteria by which the WRE will be reviewed are described in the WRE Models and Guidelines.

Municipal Growth Element (MGE)

The text of the Plan states that the MGE requirements have been addressed. MDP has reviewed the draft plan for MGE compliance and offers the following comments. While many of the requisite items have been addressed in the draft Plan, there are still several components missing or in need of additional discussion.

The draft Plan seems to address several of the requirements for the Municipal Growth Element, however they are difficult to track as the various items are dispersed throughout many chapters and sections of the Plan. The Maryland Department of Planning recommends that the Municipal Growth Element be its own distinct, separate section in the Plan. While it is closely linked to both the Land Use and Community Facilities Elements, a clear delineation between those sections and the Municipal Growth Element should be made.

In reorganizing this element, it would be helpful if the Town began this section with the discussion on population projections and household demand; followed by past and future land use trends and needs, and then identified future growth areas and their impacts on infrastructure and services. The Town may want to review MDP's Models and Guidelines #25.

House Bill 1141 requires the MGE examine the relationship between infrastructure supply and future demand for annexation areas. This includes: public school capacity, library services, police, fire, water and sewer facilities, stormwater management systems, and recreation facilities. The draft Plan primarily discusses the fiscal impact for these items. The Plan does provide some brief discussion with respect to most of these items, but additional detail on each of these items is necessary, as well as a discussion about additional staff or infrastructure needed if more area was annexed into the Town.

MDP did not see a development capacity analysis in the draft Plan. A development capacity analysis or build-out analysis is a required item for the MGE. MDP understands that the Town has requested assistance from MDP in the completion of this analysis and encourages the continuation of this process, so it may be included in the final comprehensive plan update. Additionally, the Town may want to mention in the draft Plan that it is currently working with MDP on completing this analysis.

Completing this analysis would satisfy the requirement set forth in House Bill 1141, and in the Development Capacity Analysis Local Government MOU (signed by the Maryland Municipal League and Maryland Association of Counties in August, 2004) and the Development Capacity Analysis Executive Order (signed by Governor Ehrlich in August, 2004), which committed local governments to complete a Development Capacity Analysis as part of their Comprehensive Plan updates. These commitments are the result of recommendations set forth in the Development Capacity Task Force Final Report, a copy of the full report is available at www.mdp.state.md.us/develop_cap.htm.

The Plan does identify the household capacity of several residential development projects currently in the pipeline and two recent annexations. This information should be folded

into the development capacity analysis and related to the population projections to determine the relationship between land supply and future population demand in the Town. By completing this analysis, the Town will be able to analyze the need for future annexation. In the context of planning, this analysis is important because it helps to determine if there is the proper balance between land supply and demand.

- Provide too little land for development (be it on greenfields, redevelopment, or infill), and the land cost will become too high or development may spill over to adjacent jurisdictions.
- Provide too much land for development and it will tend to be used inefficiently. In addition, plans and growth controls will be marginalized because there are an abundance of locational options for each new development.

Additionally, the Town should ensure that the following requirements are addressed in the Plan:

- The Plan should outline any areas subject for future annexation and the type and density expected for these areas, a timeframe for future annexations should also be included.
- A discussion on how the build-out analysis corresponds to projected growth, in addition to a timeline for what lands will be developed and when they will be developed to meet future demand should be included.
- A more detailed plan for how the Town plans on financing future facility needs is necessary. If it is the Town's intent that developer(s) absorb infrastructure expenses associated with major development, what portion of the costs should developer(s) absorb? Should the developer(s) donate land for a school site, pay for the update of a treatment plant, or increase capacity for public water? Under what conditions should the developers provide such assistance?
- Projected additional community facility needs and the potential location for those facilities should be addressed. Additional information should be provided on the potential impacts of the projected growth on all community facilities, even those services the Town does not currently provide.
- What, if any, sensitive areas will be impacted by future development? How does the Town plan on minimizing or mediating these impacts?

The Town should also be aware that House Bill 1141 requires the Town to submit its Municipal Growth Element to Somerset County for a 30-day review period. After that 30-day period, the Town and County must schedule a meeting to discuss the MGE and that meeting is to occur within 30 days following the initial 30-day review.

Priority Funding Areas

- In the “Marketing for Economic Development” section (page 21), Priority Funding Areas (PFAs), Enterprise Zones and HUB Zones are identified as tools for economic development. It would be helpful if this section included a brief description of what each of these tools are and how they work in promoting economic development. Also, the text implies that all of Princess Anne is an Enterprise Zone and that is not the case. For several reasons, it would be very helpful to include maps in the Plan that show the boundaries of PFAs, the Enterprise Zone, and the HUB Zones.
- In the same section, it is noted that the entire Town is a PFA; however, please note that annexations after January 1, 1997, must be submitted to the MDP for PFA certification. Additionally, effective October 1, 2006, properties annexed into the Town that have County PFA status do not retain PFA status and do not automatically become PFAs once annexed into the Town. Page 44 of the Plan identifies two recent annexations, Westfield and Wainwright. If the Town has not already done so, we encourage the Town to submit these annexations to MDP for PFA certification.

Article 66B Mandated Elements

General Assessment: It would be helpful if the Plan were organized into clearly defined sections related to each mandated element. Condensing the Plan’s information into subject areas such as Goals and Objectives, Demographics, Municipal Growth/Land Use, Water Resources, Community Facilities, Sensitive Areas, and Transportation would make the Plan much easier to follow and interpret. Each section would then include the background information, goals, objectives, and recommendations all within each required element and all on the same subject matter.

Because there are no sections that are the actual required elements, it makes it very difficult to determine if the mandated elements have been thoroughly addressed. A typical comprehensive plan format with the stated goals, principles, policies, and actions does not begin until page 53 of the 75-page document and, even then, the elements are hard to distinguish. MDP recognizes that the reasoning for this format option is explained in Section 4.7 on page 74, but MDP thinks it is relevant to point out that this format requires the reader to search several pages of the document in order to “piece together” all aspects of one Plan Element. For example, if the reader is interested in the Land Use recommendations of the Plan, then one must look at six (6) different sections of Chapter 4, which includes 20 different policies and 16 action items spread throughout those six sections. This does not include any land use information referenced in Chapters 2 and 3. In lieu of this format, a concise focused effort to address each element individually would enable the reader to locate the Land Use Element where all relevant information could be found.

Statement of Goals: The terms guiding principles, goals, policies, and actions are used in the Plan. Although the terminology and format appear to meet the intent of Article

66B, it is not utilized until page 53, which is the last section (Section 4) of the document. Generally, the principles, goals, policies, and actions are clear to the reader.

Transportation Comments: The document does not contain an individual transportation element, but rather, step-by-step, the draft plan analyzes current planning conditions, discusses the Town's unique opportunities and potential challenges, and recommends planning principles, goals, policies, and specific actions in addressing the issues raised during the Plan development process.

With regard to the transportation planning, MDP respectfully offers the following comments for your consideration.

US Route 13 offers both benefits and challenges to the Town. Protecting traffic safety and transportation capacity for US 13 will benefit the Town and the region in the long run. The Town should include a policy statement that specifically addresses the need for protecting traffic safety and capacity on US 13. Perhaps specific actions should include implementing access management/control in working with the State Highway Administration, and managing land uses along the corridor to minimize adverse effects on the highway.

The proposed UMES Boulevard extension is to improve the connection between the east and west sides of US 13 and support the New Village Center development. The section of the proposed UMES Boulevard extension between Mt. Vernon Road and Deal Island Road may help to improve the link between these two roads; however, since the area east of the new road is not planned for growth, building this section of the new road could adversely affect land uses as the new road may spur unwanted developments outside of the Town's growth area. MDP suggests the Town consider improving existing roads or planning alternative roads that are within the growth area to improve the connection between Mt. Vernon Road and Deal Island Road.

The northern section of the proposed UMES Boulevard extension between US 13 and Mt. Vernon Road forms the Town's growth boundary while supporting the New Village Center development. However, such a ring road may make the land west of the roadway vulnerable for potential development. The Town may want to design a grid roadway pattern that supports the planned development while not providing obvious potential to facilitate further development outside of the growth area. The Town may be aware that the area west of the proposed New Village Center is identified by the Maryland Department of Natural Resource as a green infrastructure hub. As DNR describes, green infrastructure hubs are unfragmented natural resource areas that are vital to maintaining the State's ecological health.

The plan should discuss the existing and future status of the railroad and associated transportation and land use issues if there are any, and make recommendations on solving these issues.

Improving pedestrian and bicycle connections in the Town, particularly for UMES students, is a focus of the Plan. It appears that there isn't any trail/bicycle connection planned along Somerset Avenue from Mt. Vernon Road to downtown. A trail or bicycle access along this section of Somerset Avenue will provide a better and more direct link for students and residents from northern areas of the Town to the downtown area.

It is unclear if the Town's development regulations require developers to provide pedestrian and bicycle facilities as part of required transportation improvements for a development proposal. To implement the proposed pedestrian and bicycle facilities, the Town needs such a provision in its development regulations, therefore this concept should be included as an action item in the Plan.

Community Facilities Comments: There is no Community Facilities Element, but Table 4.2 on page 74 indicates that the requirements of this element have been addressed in policies and action items listed in Sections 4.2 through 4.6 of the Plan.

Water and Sewer

It is disconcerting how the Plan fails to adequately address the apparent urgency of increased water and sewage supply with respect to projected growth in the Town. The Comprehensive Plan clearly states, multiple times, that the current water supply, and to a lesser extent sewer, is insufficient to support future development. The future conditions are explicit, no new development can be constructed until an additional water supply is found (short term) or the Town is able to decrease its water consumption (long term).

The Comprehensive Plan offers no specific or general suggestions as to how the looming water crisis will be resolved. Instead it states that various stakeholders, including residents and local government officials will meet to decide what to do about the situation. At the same time, the Comprehensive Plan projects a 182% growth rate in the number of households and a 215% growth in population over a 30 year period without the water and sewer facilities in place to support this growth. Additionally, there is a question with respect to infill development, which the plan does call for. What is the true infill potential and how will this put further strain on the existing water and sewer constraints? If the water shortage the Town is facing is truly as imminent as it appears to be in the Plan, the Town should work with the County and the Sanitary District Commission to take a much more proactive approach to resolving the issue. The Plan should more thoroughly explain this situation and provide further detail on the matter.

It is unfortunate that the 2005 Somerset County Water and Sewer Plan (WSP) is not current with its data to sufficiently document water and sewer needs beyond 2000. The WSP is the document that outlines the current demands, the immediate projects to meet the 5 to 10 year needs, and the overall capabilities of the systems networks to facilitate safe and adequate water supply and the highest quality sewerage management and discharges possible. This draft comprehensive plan does not contain this vital information because the County WSP has not been updated. There is a draft Water and

Sewer Plan that the County is about to submit for State review, however it is unlikely to be ready prior to the anticipated adoption of this comprehensive plan.

The projected water and wastewater demands for the year 2000, found in the 2005 Water and Sewer Plan, correlate with the 2030 projected growth demands of the Comprehensive Plan Update, however no information is provided on how these capacities could be attained in light of the nutrient TMDL limits and WWTP caps. The current Water and Sewer Plan is not informative towards this Comprehensive Plan update, and the lack of a complete Municipal Growth Element and Water Resources Element prevents the Town from having the necessary related and relevant information for the planning of the projected growth. Ideally, both plans should be developed in concert with one another and the Town's consultant should share his plan projection information with the County's WSP consultant and with Somerset County and the Somerset County Sanitary District Commission to evaluate the Town's projections against all available water resources and sewer capacities.

On page 48, under Section 3.2, Impacts on Community Services and Roads, Water and Sewer, the plan acknowledges the lack of water supply to allow for any new growth and indicates that ample water and wastewater will need to be allocated from the County to consider the projected growth in Princess Anne. As previously mentioned, it seems pertinent to follow up on what might be in the works now or completed in the near future to meet these needs.

In Section 4.4, Planning in Balance with Adequate Community Facilities; which contains the guiding principles, goals, policies and actions for the Town's police, fire, emergency service, water and sewer, schools and parks, and public buildings; Policy 3 on page 67 seems to indicate a certain Town control of the water and sewer facilities by limiting extensions and services to areas only adjacent and within the Town Limits. An action statement for this Plan should indicate:

- That the WRE summarize the service agreements between the Somerset County Sanitary District (SCSD) and the Town.
- The capacity management plans of the SCSD and what projects are needed to meet the Town's growth demands.
- That the Town and the County should collaborate on their growth goals and water resources management programs to facilitate a CIP that will provide balanced growth to resources.

These items should be accomplished prior to the completion of this Plan and such consideration should include infill potential as well as the various commercial and industrial ventures mentioned in the Plan. The Industrial Park businesses will impact the water and wastewater needs significantly and this Plan update does not provide the base flow calculations to inform the County of the Town's needs. The WWTP that serves

Princess Anne is currently on schedule to be upgraded from BNR to ENR. This should be mentioned in the Plan as well.

The last bullet on page 17 seems to state that Somerset County provides water to the Town, but that a Sanitary District provides sewer. MDP is under the impression that the Somerset County Sanitary District Commission is responsible for providing both water and sewer to the Town.

There are several places in the Plan where a reference is made to the Princess Anne WWTP. This may prove to be confusing because it seems to imply that the Town owns a WWTP. This should be clarified whenever possible in the document.

Schools

The Plan was reviewed by MDP for consistency with the objectives of the Public School Construction Program. The State-Rated Capacities and enrollment projections provided in the draft Plan are consistent with the State's numbers. The Comprehensive Plan and the Educational Facilities Master Plan are also consistent. According to both plans, the existing schools are under capacity and while the Princess Anne Region is targeted for residential growth (second home/pre-retirement buyers), it is not anticipated that there will be any significant impact on the existing schools in the next 10 years.

On page 40, it would be helpful to provide some additional information about the schools, such as their location, year of construction, condition, grades served, State recognition as a blue-ribbon school, and facility amenities.

Library

The information provided on the library is very brief. Additional pertinent information to include would be the year the facility was built; the building's condition; amenities available (i.e. computers); services, classes, or activities offered; and if the building size and book inventory are appropriate for the existing and future population to be served.

Parks and Recreation

It seems appropriate to analyze and discuss the State's open space and recreational acreage standards with respect to the Town's existing and projected population to see how the Town fares with respect to open space and recreational goals. Other recreational facilities should be included in this section such as facilities at the school sites and the County facilities on Crisfield Lane and behind the Somerset County Office Complex.

In Section 3.2 (Parks) on page 48, it would be helpful to reference the Somerset County Land Preservation and Recreation Plan as well as provide information about the new 4.3 acre recreational facility the Town is planning in conjunction with UMES. This would also be a good area to discuss how the Town fares with respect to the State's open space and recreational acreage goals.

Town Offices

This section says very little about Town Hall and Public Works other than their physical location. A discussion of how the facilities do or do not meet the needs of the Town seems appropriate, to include: adequate space for employees, access to the public, condition of the facilities, adequacy of meeting facilities, etc...

Police

One major project that was not highlighted in the Police section of the Plan was the police department renovation. This substantial Town project seems worth mentioning in the Plan as it also lends to historic preservation of this community.

Section 4.4 Planning in Balance with Adequate Pubic Facilities

The goals section suggests that the Town wants to gain more control over its water supply. Does this philosophy apply to sewer as well? The policies and action items within the section only address water, sewer and police protection. No policies or actions items are included for schools, recreation, town government and facilities, the library, EMS, roads, or fire protection.

Sensitive Areas Comments: Again, there is no sensitive areas element, per se, however natural resource and environmental protection is a central theme throughout the document, which is commendable and much more progressive than the previous plan.

The Plan addresses streams and stream buffers, non-tidal wetlands, floodplains, steep slopes, endangered plant and wildlife species, and soils. The Plan does not appear to address tidal wetlands, areas of Critical State concern, or agricultural and forest lands intended for resource protection. Additionally, the Forest Conservation Act (FCA) is not mentioned in the Plan. The FCA should be addressed and the Plan should explain the relationship between the County and the Town with respect to FCA development reviews.

The Chesapeake Bay Critical Area Law is discussed in the document, however some of the information is incorrect. For example, transportation and utility lines are not restricted uses in the Critical Area; and only new solid or hazardous waste collection, new sanitary landfills, and new sludge handling facilities are restricted in the Critical Area. It would be helpful and informative to add the following information to this section: that the Town has its own Critical Area Ordinance, the year it was adopted, % of Town in the Critical Area, the number of acres of each land use management classification (IDA, LDA, and RCA), and some information about the 100' Buffer. All of this information is available in the Town of Princess Anne's Critical Area Program document.

Specific recommendations include:

- On page 63 it is not accurate to state that much of the Town's Critical Area is in agricultural use, however, it is accurate to state that much of it is developed.
- The third bullet under Goals on page 64 states that over time it is the Town's goal to reduce the amount of impervious surface. It would be interesting to follow-up on this goal statement and provide an action item as to how this might be accomplished.
- Page 65 contains an action item that recommends the Town preserve permanent open space within the Critical Area. This may be difficult to achieve as the Plan also acknowledges that much of the Town's Critical Area is already developed.

In the Sensitive Species Habitat section on page 25, it is stated that Princess Anne and its surrounding area are part of the Sensitive Species Project Review Area and that all development review is required to go through a sensitive species review process. Is this review process applicable to every development review in the Town, and if so, who is responsible for conducting this review? Is this a federal, State, or locally designated area? More detail should be provided about this designation and the process for the required development review process.

The Streams and Stream Buffers section on page 26 talks about "required" buffers. It is recommended that the word "required" be replaced with "recommended" as these are not statutory requirements for buffers. In addition, the title of Table 2.14 on page 27 should be revised to reflect the fact that these are recommended buffer widths, not required.

The section on the Manokin River on page 27 should address the issue of Total Maximum Daily Loads (TMDL's) for the Manokin and should provide any relevant information MDE has available for this tidal tributary. Many of the problems with water quality in the Manokin River are caused by land uses outside the Town's boundaries. The Plan should describe what leverage the Town can exert with other entities, or what cooperative ventures it can join with other parties, to help clean up the river. The Floodplains section on page 28 should include information about the Town's floodplain ordinance and how that ordinance factors into the review process for development within the floodplain. This section should further explain how these sensitive areas are managed and protected.

The Wetlands section on pages 28 and 29 seems to state that all of the wetlands in the Town are non-tidal and are all designated as Wetlands of Special State Concern. Critical Areas maps show several areas of tidal wetlands within the Town. This should be further verified, as well as the Special State Concern designation.

The Groundwater section on page 29 seems like a missed opportunity to discuss the dry well and water shortage situation in a valuable and informative way. Since the water supply is such a pressing issue in the Town, MDP suggests that the Town take every opportunity to address this matter in this planning document. This section seems too general and too brief given the magnitude of the 2007 dry well crisis.

Land Use Plan Comments: Relevant information pertaining to the Land Use Element is scattered throughout the document, therefore review comments will be provided in the order the information is found in the document, as follows:

- In the Current Zoning section on page 31, the R-1 and R-2 minimum lot size information should be clarified to reflect that the 7,500 square feet is for single-family dwellings only and that different requirements exist for other types of residential uses.
- On page 32, the Industrial Park District should be changed from I-2 to I-P.
- In the Analysis of Current Zoning section on page 32, it seems appropriate to discuss the fact that several historic residential homes in and around downtown Princess Anne are zoned commercial, which poses a real threat to the historic character of the Town. There should also be additional discussion about creating a true historic district overlay zone.
- On page 34, there is a discussion about “edges” being areas created for where the Town ends and the countryside begins. However, there appears to be a conflict in where these edges are shown in Exhibit 2.6, Community Design. This exhibit indicates a few large areas as “Green Edge” around the outside of the Town boundary. One area on the south side of Town and one area on the north side of Town conflicts with the Land Use Plan Map. The area on the south side is the same area that is designated to be a 190-acre Industrial Park expansion and the one to the north is identified as the New Village Center growth area. This conflict should be addressed.
- The first paragraph on page 44 implies that there is no remaining infill potential within the Town absent what is presented in Table 3.2. However, on page 46 the Plan states that Town infill potential is limited to around 40 lots. It may be appropriate to wait until the Development Capacity Analysis is finished before making any estimates of infill potential. The Development Capacity Analysis that the Town is working on with MDP will help the Town get a better handle on the infill potential of all residentially zoned in-town parcels.
- The first paragraph on page 45 speaks to student housing and says that a recently approved project for 60 student housing units will help to meet the University’s growing needs. Based upon Table 3.2 on the previous page, the 60 units referenced appear to be associated with Arden’s Run (Phase 2). Aren’t the 47 units approved for Talons Point South for student housing as well?
- The future land uses are outlined in Table 4.1, however residential densities are not recommended for each residential land use category, nor are the anticipated uses distinctive or well defined. For example, what constitutes low impact institutional uses in the Preserved Green Corridor? Also, duplexes or two-family structures are not listed in any land use category, just townhomes and multi-

family. Also, the mixed-use land use category that seems to correspond to the downtown area does not list any residential uses except those above commercial uses. As previously mentioned, there are many historic existing single-family dwellings that exist within this mixed-use area and this issue will have to be reconciled, as the description of the historic downtown on page 57 states that this area should maintain its mix of small scale shops and housing.

- It is unclear as to why a new village community is shown in the Plan adjacent to the northwestern portion of the Town. This proposal seems contradictory to a great deal of text in the Plan that encourages ways to make the Town less separated by US Route 13 and more integrated as a community. This proposal could have unintended adverse impacts on the historic downtown, both commercially and residentially. It could also create additional traffic hazards on Mt Vernon Road, even with considering a possible extension of UMES Boulevard. It is unclear how this proposal would help to enhance the interconnectivity and integration of the east and west sides of the Town.
- The action items on page 59 are good. The architectural and design guidelines should be predominantly pictures instead of words. Similarly, MDP recommends that the revised zoning ordinance be a form-based code, based on a public charrette, to ensure that the resulting development will be what the plan envisions.
- The Plan does a good job of addressing opportunities for cooperation between the Town and UMES, however MDP recommends that more extensive cooperation take place. The viability and future form of the Town largely depends upon UMES, but as is the case in many college towns, the residents are wary of large concentrations of college students. A joint plan between Town officials/residents and University students/administrators can establish a tradition of trust and mutual support in addition to linking the Town and the University physically, especially in the downtown area. This joint plan could also be expanded to include future University facilities, such as dorms and a bookstore, to be located downtown and could help to create initiatives that residents and students can work on together for the mutual benefit of the Town and the University.
- The Plan does a good job of stressing the importance of sensitive and environmental areas and how the significance of these areas should be carefully weighed against future development proposals.
- An important item that is not addressed in the Plan is the “holes” in the existing corporate boundary of the Town. There are several areas where County land is surrounded on three sides by municipal land. It seems appropriate to have an action item that would discuss how this situation could be resolved.

Mineral Resources Element: The Plan acknowledges that there are no mineral resources in Princess Anne.

Historic Resources /Heritage Tourism: The Town of Princess Anne is part of the Lower Eastern Shore Certified Natural Heritage Area. Inclusion in the Heritage Area requires that a comprehensive plan reference be made to the Heritage Tourism Plan. At a minimum, MDP suggests inclusion of the following language in the comprehensive plan: “The Lower Eastern Shore Heritage Area Tourism Management Plan certified in June of 2003, and as may be amended from time to time in the future, is hereby incorporated, by reference, in the Town of Princess Anne Comprehensive Plan.” The heritage tourism attractions mentioned on page 21 should be expanded to include Olde Princess Anne Days, Octoberfest, Streetfest, and the Manokin River Park Farmer’s Market.

The information provided about the 25-room hotel at UMES as part of the school hotel management curriculum is good, however it may not be necessary to include the negative statement about inconsistent care of the rooms. As long as the text recognizes that it is a student-training program, then it should be understood that visitors are part of the learning experience. There should be a way to state this in a more positive manner.

Implementation (Section 4.8)

This section sets out a very ambitious six-year timeframe for implementation of the 31 action items addressed in Section 4 of the Plan. Since the Plan sets a 20-year planning period, it may be more appropriate to break the action items down into more reasonable time frames.

In item #1, the Forest Conservation Act should be mentioned. Also, the comprehensive re-zoning should be expanded on a bit more so that the process is fully understood as it is more than just a re-zoning or zoning amendment process.

Item #3 should also reference other State agencies that may be of assistance to the Town such as Maryland Historical Trust, Business and Economic Development, and Housing and Community Development.

Mapping

- In general, the maps should be assigned page numbers. The table of contents lists page numbers for mapping, but they are not accurate and this should be corrected. In addition, all of the maps are at a scale that makes it impossible to apply the information depicted on a parcel specific basis. This is especially problematic with respect to the Future Land Use Plan Map. Too much of the surrounding area outside of Town is shown on the maps instead of the focus being more on the Town itself, which would, in turn, support a larger scale map.
- It seems key to keep in mind that the end-user of this document is most likely going to be an individual that is not well versed in the interpretation of aerial

imagery, so perhaps removing this imagery from the mapping would render the maps more user friendly.

- The Vicinity Map does not really provide a good depiction of the location of Princess Anne within the region. The text states that it shows the Town's location on the Delmarva Peninsula, but the imagery provided does not appear to extend beyond a very small area of Somerset County. It would be good to have a map showing Princess Anne's place on the Delmarva Peninsula and its relationship to other major metropolitan areas. In addition, the legend on this map has been left blank, however assuming the red line represents the corporate boundary, the configuration of the boundary is inaccurate and should be corrected. It is also unclear why this map contains satellite imagery.
- The Environmental Areas Map includes background imagery that distracts from the intent of the map and makes it more difficult to interpret. The municipal boundary is not connected in several places, thus giving the impression that there are four separate areas of the Town. A distinction should be made between tidal and non-tidal wetlands.
- The Soils Map includes large areas outside of the corporate boundary and includes those areas in black and white, so no information can be derived from their inclusion. It would be helpful to show the corporate boundary on this map to see where the soils lie with respect to the Town. The legend is very small scale and difficult to read.
- The Existing Land Use Map would serve as a better planning tool if there were less focus on the surrounding areas and more on the Town proper. This way the map could be shown at a larger scale and parcel specific information could be derived. As previously mentioned, the corporate boundary is disconnected and needs to be revised. It should be noted that it is very hard to distinguish between the colors afforded to the high density residential land uses versus the commercial uses.
- The Transportation Map shows a disconnected Town boundary and it would be helpful if all of the referenced roadways could be either named or their route numbers provided.
- Page 53 states that Section 4 contains three maps, but fails to mention the Municipal Growth Map, which would be the fourth map for this section.
- Comprehensive Plan Map:
 - It is unclear based upon the description of this map provided on page 53 how this map is different from the Future Land Use Plan Map. It is confusing to have a comprehensive plan map and a future land use map that both show land uses. It is difficult to determine what role each map plays in the planning process. The role and relationship of these two maps

should be better explained in the document or only the future land use map should be included in the final document.

- The legend is hard to read and does not include medium or high-density residential designations even though they are shown on the map.
 - The Town boundary is disconnected and the colors are difficult to identify when compared to the legend.
 - Too much of Somerset County is shown which makes the scale of the Town too small to be able to apply land use on a parcel specific basis.
 - The greenbelt locations are different than green edges shown on previous maps in the Plan.
 - There are areas inside of the municipal boundary where no land use is assigned. For example, the industrial park and student housing.
 - It is confusing to have land uses designated outside of the town boundary when these areas do not appear to be part of any growth boundary or growth plan for the Town.
 - The small scale of the map prevents one from being able to see where several legend items are on the map. For example, it is difficult to see the preserved green corridor, the trail network, and streams within the Town.
 - There is no growth boundary depicted for the Town and future annexation areas are not depicted. It is recommended that the Town look at the Somerset County Comprehensive Plan to review the growth area depicted for Princess Anne and see how, if at all, it coincides with the Town's growth plan.
- Comprehensive Plan Future Land Use Map:
 - The review comments mentioned above for the Comprehensive Plan Map are relevant for this map as well, to include: disconnected Town boundary, small scale of map, too much peripheral land shown, difficult to see legend items on the map such as the preservation corridor, greenbelt areas shown differently, colors hard to distinguish between such as commercial and student housing, and land uses are shown in the County that are not part of the growth area.
 - There are areas within the existing corporate boundary that are shown as agriculture and woodlands for future land use. This may make sense for some environmentally sensitive lands or fringe lands, but some of these sites appear to be wedged between highly developed areas. For example, there is an agricultural area shown between the high-density residential area and the industrial park to the south of Town. There is another agricultural strip shown in the vicinity of Manokin Manor Nursing Home on the west side of US 13.
 - It is unclear why a growth boundary is not shown on this map. By not including a growth boundary, it is difficult to tell which properties are proposed for future growth and annexation. As previously mentioned, the Somerset County growth boundary for Princess Anne should be reviewed to see how it coincides with the Town's growth plan outlined in the Plan.

- Comprehensive Plan Municipal Growth
 - All of the previous review comments for the Comprehensive Plan map and the Future Land Use Plan map generally apply to this map as well.
 - Although it is not completely clear, it would seem that this map is depicting the growth plan for the Town for the 20-year planning period. If this were the case, then the three focus areas highlighted would be the only areas included for future growth and annexation considerations. This could pose a dilemma for the Town should other property owners outside of these focus areas approach the Town with development and annexation proposals. If this were to occur, a comprehensive plan amendment would likely be necessary, particularly with respect to the extension of public water and sewer.

- Town Design Map
 - This map has no title, north arrow, scale, or legend.
 - The presentation of this map could be much better if the gateways were more the focus instead of all the outlying black and white aerial photography.

Tables

- It would be helpful for Table 2.1 on page 7 to include the total number of units.

- The total 2000 school enrollment number of 2,313 listed in Table 2.3 does not appear to be accurate. The individual enrollment numbers add to 1,049 total students, which would also make the percent of total population for each incorrect as well.

- There is a typo in Table 2.13 regarding the total housing units. The total should be 1,117 instead of 1,107 and therefore the corresponding percent of totals are incorrect as well.

- Table 3.2 on page 44 indicates that St. Stephens Corner consisted of 12 approved lots, but the final subdivision approval was for 28 lots. Additionally, if 3 permits have been issued then the remaining units for this subdivision would be 25 and not 0 as shown. This chart needs to be revised based upon this information.

- Table 3.4 projects households and thus population based upon average household size to the year 2030. According to the Table, the average household size used for these projections was 2.60, however the text on page 46 as well as footnote #9 on that same page indicates that an estimated household size of 2.45 was utilized for projections. Also, the 2000 household data presented in Table 3.4 does not equate to the 2000 population in the table ($992 \times 2.30 = 2,281.6$, not 2,313).

- Table 4.1 refers to “protected green corridor” instead of “preserved green corridor” as shown on the Land Use Plan Map. Also, agricultural and woodland

land uses are depicted on the Future Land Use Plan Map, but those land use categories are not included in Table 4.1.

Exhibits

- Exhibit 2.6 would prove more beneficial if the photos were slightly enlarged and some text was provided beside each photo to identify what is being shown. In addition, the text on the previous page states that this exhibit depicts various town focal points that, in turn, cannot be easily located on the exhibit.
- The sidewalk exhibit is incorrectly numbered and is very difficult to interpret in any informative manner.
- Exhibit 3.1 on page 45 is missing the household years from its X axis.

Additional Items

- The Table of Contents contains a number of incorrect sub-heading and page numbers, sub-heading titles that differ from the text in the Plan, and typos.
- On page 4 in the Location section, it would be helpful to more fully depict Princess Anne's "place" in the region. For example, the number of miles to Salisbury and Pocomoke, major access routes, relationship to major metropolitan areas, etc...
- The Major Private Development Projects section on page 7 states that "projects that are discussed here", but then no discussion takes place. A table containing a list of each development and proposed number of lots is all that is provided. In addition, there is no discussion here about how water and sewer capacity issues play into these development approvals.
- The fifth bullet on page 18 incorrectly spells Wor-Wic Community College as Warwick.
- The Commercial Development section on pages 18 and 19 identify an "uptown commercial district" along Mt. Vernon Road. The description of this area includes a hotel. A hotel location is also mentioned in the US Route 13 Highway Commercial area, however Princess Anne only has one hotel. This should be corrected.
- On page 66 in the Background section, it is stated that the households will grow from 1,240 in 2006 to 2,700 in 2030. The 2030 projection should be 2,800 instead of 2,700.
- Several places in the Plan refer to the Planning and Zoning Commission as the Planning and Zoning Board. This group is referred to in the Plan by both titles

and, in order to avoid confusion, it would be beneficial if they were referred to in the same manner throughout the document.

- The public hearing date on page 3 needs to be revised.
- The Plan should be thoroughly reviewed for typographical errors.